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Before the  
Federal Communications Commission  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter Of )  
 )  
Replacing Part 90 )  
 )  
with Part 88 )

PR Docket 92-235

Comments to a Proposed Rule Making

by Michael G. Redman

KA0YXU, KAE 0995

PO Box 16673

Clayton, Mo. 63105

*Michael Redman*

February 22, 1993

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I would like to begin these comments by advising that I am a licensed amateur operator (KA0YXU) and operate a General Mobile Radio Service (G.M.R.S.) system (KA0YXU). I am a technical advisor for a large public-safety agency regularly involved in the procurement of radio equipment, preparation of bid specifications, preparation of frequency coordination / F.C.C. application forms, equipment maintenance responsibility through a contracted maintenance company, and related technical assistance. I perform private consulting services as required for agencies outside the agency for which I have been employed for nearly 20 years. I am a member of Missouri's 800 Mhz. development committee, and a number of related public safety associations and organizations. Public safety agencies in the metropolitan St. Louis area regularly consult with me for assistance with frequency coordination requests and F.C.C. application preparation.

The material available to me on this docket came from material supplied by the Associated Public-Safety Communications Officers and I have been unable to review the entire text.

I agree with the concept of consolidation of public safety radio services. This is presently being accomplished by inter-service sharing which is often expensive and cumbersome. I feel, however, that this consolidation could take place within the next few years without the technical changes suggested in this docket.

I am concerned about the increased involvement of the frequency coordinators in this process, as present systems must be modified to meet new technical standards. In some areas like Missouri, they often attempt to re-engineer a local system that has been designed or modified by qualified system designers to perform in a given manner. Were it not for existing

and other Missouri power plants and generators, the

with the implementation schedule. If these technical parameters are adopted, I suggest that they not be made mandatory for a minimum of ten years. The department for which I am employed, no doubt typical of many, just cannot afford to junk 400 mobiles, 40 base stations, 35 receivers, and 350 portable radios and purchase all new equipment within six years. By allowing a longer time for implementation, agencies such as ours will be able to "phase in" equipment over a ten year period that can be adapted or programmed for present and future needs. This will permit a smoother transition than to cause everyone to purchase new equipment within a reasonable period that can function for their purposes both before and after the implementation date. I suspect that rural America will have an even more difficult time. While some of our agency's equipment is 15-20 years old, there are some rural departments using radios of 20-25 year vintage. Economically, they just can't afford to change it all, and with the present Administration, things will get worse long before they get better.

I would suggest that for the present, immediate (within three year) changes should include:

1. Greater flexibility in inter-agency sharing, with this concept broadened to include all radio services.
2. Expanded use of the 470 to 512 Mhz. spectrum in all parts of the country, when possible.
3. Another hard look at the frequency coordination process.

Not mentioned in my summary of the docket but probably involved is the (General Mobile Radio Service) G.M.R.S. portion of Part 95. While I cannot comment on what the docket addresses for G.M.R.S., if anything, I would hope that G.M.R.S. would be left in place, not removed, even if technical changes would apply. Once again, I feel that any changes should take place over a ten year period, but do not wish to see G.M.R.S. eliminated altogether. I desire to maintain a personal radio system for my family that no other portion of the radio spectrum can provide, and wish to see no licensing changes to G.M.R.S. No "shared vendor-supplied and operated system" can compare.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Michael G. Redman". The signature is fluid and cursive, with the first name "Michael" being more prominent.

Michael G. Redman